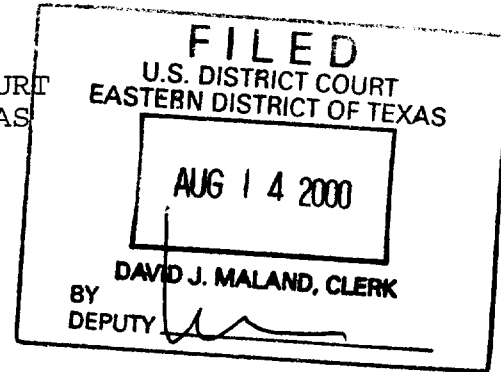


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION



NATHAN L. JACKSON, Individually §
and on behalf of a putative §
class of similarly situated §
individuals, §

Plaintiffs, §

V. §

EAST TEXAS MEDICAL CENTER, §
ATHENS, ET AL, §

Defendants and §
Third-Party Plaintiffs, §

V. §

AETNA HEALTH AND LIFE §
INSURANCE COMPANY, ET AL, §

Third-Party Defendants. §

CIVIL ACTION NO. 6:00-CV-442

CIGNA HEALTHCARE'S GENERAL'S ORIGINAL ANSWER

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW CIGNA HealthCare of Texas, Inc. [hereinafter "CIGNA HealthCare"], one of the Third-Party Defendants herein, and would respectfully show the Court the following in answer to Defendants' Original Third-Party Petition [hereinafter "Petition"]:

I.

In answer to section I of the Petition, CIGNA HealthCare admits that its registered agent, CT Corporation, may be served at 350 N. St. Paul Street, Dallas, Texas 75201, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in said section.

II.

In answer to section II of the Petition, CIGNA HealthCare states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein.

III.

In answer to section III of the Petition, CIGNA HealthCare states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein.

IV.

In answer to section IV of the Petition, CIGNA HealthCare denies that Defendants/Third-Party Plaintiffs are entitled to contribution or indemnity from CIGNA HealthCare, and denies that CIGNA HealthCare is liable to Defendants/Third-Party Plaintiffs for any erroneously-refunded payments, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in said section.

V.

In answer to section V of the Petition, CIGNA HealthCare states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein.

VI.

In answer to section VI of the Petition, CIGNA HealthCare denies that Defendants/Third-Party Plaintiffs are entitled to any relief from CIGNA HealthCare, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained therein.

VII.

To the extent not otherwise addressed above, CIGNA HealthCare denies each of the allegations contained in the Petition.

WHEREFORE, PREMISES CONSIDERED, CIGNA HealthCare prays that Defendants/Third-Party Plaintiffs take nothing by their suit against CIGNA HealthCare, and that CIGNA HealthCare recover its reasonable attorney's fees and costs from Defendants/Third-Party Plaintiffs, and for such other and further relief to which it may be justly entitled.

Respectfully submitted,



James L. Johnson
Texas Bar No. 10742020

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ATTORNEY-IN-CHARGE FOR
THIRD-PARTY DEFENDANT
CIGNA HEALTHCARE OF TEXAS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on Michael E. Jones, counsel for Defendants/Third-Party Plaintiffs, by certified mail, return receipt requested, and on David B. Lemon, counsel for Plaintiff, and Michael T. Crawford, counsel for Third-Party Defendant Combined Underwriters Life Insurance Company, by regular mail.



James L. Johnson